

STATE OF INDIANA) IN THE FAYETTE COUNTY CIRCUIT COURT
)SS:
 COUNTY OF FAYETTE) CAUSE NO.: **21C01-2006-CT-000268**

CAMERON MEYERS,)
)
 Plaintiff)
)
 vs.)
)
 WAL-MART STORES EAST, LP)
)
 Defendant.)

COMPLAINT FOR DAMAGES

Comes now the Plaintiff, by counsel, and for his cause of action against the Defendant,
 alleges:

1. At all times hereinafter mentioned Defendant owned, operated and maintained a retail store located at 4200 Western Avenue, in Fayette County, Indiana.
2. On or about May 7th, 2019 Plaintiff was an invitee on Defendant's premises when he picked up a picture frame from a display area and the frame separated causing the glass to fall on his lower extremity.
3. The picture frame at issue was manufactured by Hong Kong Company Intco International (HK) Co., LTD and distributed by Defendant.

4. The Court does not have jurisdiction over Intco International (HK) Co., LTD and, therefore, Defendant, who is the distributor and seller of the picture frame product, is also deemed the manufacturer pursuant to I.C.34-20-2-4.
5. The incident was caused by the negligence of the Defendant and it's violation of the Indiana Product Liability Act.
6. As a proximate result of the Defendant's negligence and violation of the Indiana Product Liability Act, Plaintiff has been injured and damaged, incurred reasonable medical expenses, endured pain, suffering and mental anguish and lost income and earning capacity.

WHEREFORE, Plaintiff prays for judgment against the Defendant in an amount which willfully and fairly compensate him for his injuries and damages, for his costs, and for all other proper relief.

Respectfully submitted,

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